

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

YANKEE ATOMIC)	
ELECTRIC COMPANY,)	
)	
Plaintiffs,)	
)	
v.)	No. 17-673
)	(Senior Judge Firestone)
UNITED STATES,)	
)	
Defendant.)	

DEFENDANT’S MOTION TO LIFT STAY TO COMPLETE BRIEFING

On Friday, January 25, 2019, Congress passed appropriations to fund the Department of Justice through February 15, 2019. Although the Department’s appropriation has been temporarily restored, a lapse in appropriations may recur following expiration of the limited three-week period of appropriations. Further, due to the 35-day partial government shutdown, Department attorneys must address a significant backlog of work, and will be unable to address all backlogged case-related matters for some time, and certainly not in only three weeks. Nevertheless, we believe that in the next three weeks this case may be moved closer to trial by completing briefing on motions in *limine*, along with filing objections to exhibits, and to the expert narratives and presentations. The parties propose the following schedule for these submissions:

February 8, 2019	Motions in <i>limine</i> , objections to exhibits, expert narratives and presentations
February 15, 2019	Responses to motions in <i>limine</i> , objections to exhibits, expert narratives and presentations

While the parties are available to reschedule the status conference that was originally set for January 9 during this time, the Government will not be able to commit to future trial dates or

other pre-trial deadlines until the Department receives an appropriation for a longer period of time.

Respectfully submitted,

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